

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

THE UNITED STATES OF AMERICA *ex rel.*  
JULIE LONG,

Plaintiff,

V.

JANSSEN BIOTECH, INC.,

Defendant.

Civil Action No.  
16-CV-12182-FDS

**PLAINTIFF’S MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL  
IN ACCORDANCE WITH PROTECTIVE ORDER**

Plaintiff-relator Julie Long hereby requests permission to file under seal Exhibit 1 that is being submitted in support of Plaintiff's Memorandum of Law in Support of Motion for *In Camera* Review of Documents Withheld on the basis of Attorney-Client Privilege for the following reasons:

1. The Protective Order governing this action requires that if a party wishes to use documents or information that have been designated as “Confidential Material” or “Confidential Material – Attorneys Eyes Only” in any papers filed with the Court and wishes for the Court to review such documents or information, the filing party is required to file the papers under seal, and the papers are to remain sealed until further order of the Court. *See* Protective Order (ECF 103) at § VIII.B.

2. Exhibit 1 to Plaintiff’s Memorandum of Law in Support of Motion for *In Camera* Review of Documents Withheld on the basis of Attorney-Client Privilege (ECF 446), which is Janssen’s May 13, 2024 Privilege Log, contains information that Defendant Janssen Biotech, Inc.,

has designated as “Confidential Material” or “Confidential Material – Attorneys Eyes Only” pursuant to the Protective Order.

Plaintiff respectfully requests that the Court grant Plaintiff permission to file Exhibit 1 under seal.

Dated: July 30, 2024

Respectfully submitted,

/s/ Diana L. Martin

Theodore J. Leopold (admitted pro hac vice)

Leslie M. Kroeger (admitted pro hac vice)

Diana L. Martin (admitted pro hac vice)

Poorad Razavi (admitted pro hac vice)

COHEN MILSTEIN SELLERS & TOLL PLLC

11780 U.S. Highway One, Suite N500

Palm Beach Gardens, FL 33408

(561) 515-1400

tleopold@cohenmilstein.com

lkroeger@cohenmilstein.com

dmartin@cohenmilstein.com

prazavi@cohenmilstein.com

Casey M. Preston (admitted pro hac vice)

Gary L. Azorsky (admitted pro hac vice)

Jeanne A. Markey (admitted pro hac vice)

Adnan Toric (admitted pro hac vice)

COHEN MILSTEIN SELLERS & TOLL PLLC

100-120 N. 18th Street, Suite 1820

Philadelphia, PA 19103

(267) 479-5700

cpreston@cohenmilstein.com

gazorsky@cohenmilstein.com

jmarkey@cohenmilstein.com

atoric@cohenmilstein.com

Jonathan Shapiro (BBO No. 454220)

SHAPIRO & TEITELBAUM LLP

55 Union Street, 4th Floor

Boston, MA 02108

(617) 742-5800

jshapiro@jsmtlegal.com

***Counsel for Plaintiff-Relator Julie Long***

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF and paper copies will be sent to those indicated as non-registered participants on July 30, 2024.

/s/ Diana L. Martin

Diana L. Martin (admitted pro hac vice)